



**UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
OFFICE OF THE CLERK**

MARK O. HATFIELD UNITED STATES COURTHOUSE  
1000 SOUTHWEST THIRD AVENUE  
PORTLAND, OR 97204

TEL: 503-326-8100 FAX: 503-326-8441

E-MAIL: [pjury@ord.uscourts.gov](mailto:pjury@ord.uscourts.gov) WEBSITE: [www.ord.uscourts.gov](http://www.ord.uscourts.gov)

MELISSA AUBIN  
CLERK OF COURT

PAUL BRUCH  
CHIEF DEPUTY CLERK

**FEDERAL JUROR INFORMATION LETTER**

You have been randomly selected as a prospective juror for the Portland Division of the United States District Court for the District of Oregon. Jurors in the Portland Division include residents from the following counties: Clackamas, Clatsop, Columbia, Hood River, Jefferson, Multnomah, Polk, Tillamook, Wasco, Washington, and Yamhill.

**You must respond to the summons online or by mail within five business days of receiving it** (regardless of when you received it). Your response is required by federal law, and you must respond even if you are requesting deferment or excuse. You may complete the summons response one of two ways:

|                 |   |
|-----------------|---|
| <b>Online:</b>  | <ol style="list-style-type: none"> <li>1. Visit the Court's secure website, <a href="http://www.ord.uscourts.gov">www.ord.uscourts.gov</a>.*</li> <li>2. Hover over the "Jurors" tab.</li> <li>3. Click "Log in to eJuror".</li> <li>4. Enter your: <ul style="list-style-type: none"> <li>• nine-digit participant number (highlighted in yellow on the summons),</li> <li>• the first three letters of your last name, and</li> <li>• your date of birth.</li> </ul> </li> <li>5. Click the "Login" button.</li> </ol> <p><i>*If using a mobile device, use Desktop Mode for increased compatibility.</i></p> |
| <b>By mail:</b> | Complete the lower portion of the summons and return in the enclosed, postage-paid envelope.  |

Deferment and excuse information, including supporting documentation requirements, can be found on the back of your summons and at [www.ord.uscourts.gov/jurors](http://www.ord.uscourts.gov/jurors) under the "Request Deferment or Excuse" tab.

You must complete the following steps to request deferment or excuse:

1. Respond to the summons within five business days of receipt.
2. Submit your request and supporting documentation by e-mail, fax, or mail (supporting documentation is not subject to the five-day response deadline).

**You must call 503-326-8111 after 4:00 pm the business day before your summons date to hear your reporting instructions.** The automated message will tell you if you do, or do not, need to report for service. Occasionally, cases are terminated or rescheduled as late as the day before the trial is scheduled to occur, which may mean that your service as a juror may not be required. If you are not required to report for service as summoned, and you fail to call 503-326-8111 for updated reporting instructions, you will not be paid an attendance fee or be reimbursed for parking or long-distance travel expenses.

If you are a long-distance traveler (75+ miles, one way), detailed information on travel regulations, lodging expenses, per diem, travel certification, and tax forms is enclosed.

We sincerely appreciate your time and service, and hope you find your federal jury service interesting and rewarding.

Sincerely,

*/s/ Nicole Muñoz*

Nicole Muñoz  
Jury Supervisor

Enclosures

#### FREQUENTLY ASKED QUESTIONS & ANSWERS

| QUESTION  | ANSWER   |
|---|--|
| How do I know if I need to report for service?                            | Call 503-326-8111 after 4:00 pm the day before your service date. The automated message will tell you if you do, or do not, need to report.  |
| Do I have to respond to the summons if requesting deferment or excuse?    | Yes. You must respond to the summons within five business days of receiving it. Deferment requests and supporting documentation are not subject to the five-day requirement.   |
| What documentation is required to consider a deferment or excuse request? | Refer to the back of the summons or the "Request Deferment or Excuse" tab at <a href="http://www.ord.uscourts.gov/jurors">www.ord.uscourts.gov/jurors</a> .  |
| Where can I send requests and supporting documentation?                   | E-mail: <a href="mailto:pjury@ord.uscourts.gov">pjury@ord.uscourts.gov</a> Fax: 503-326-8441<br>Mail: 1000 SW Third Avenue, Room 201, Portland, OR 97204   |
| Was my deferment or excuse request granted?                               | Call 503-326-8111 to check the status of your request. If your request is pending, the message will instruct you to keep checking the message. If your request is granted, the message will relay that information.  |
| Where do I report for service?  | 1000 SW Third Avenue, Room 201, Portland, Oregon, 97201. The Courthouse is on SW Third Avenue between SW Salmon and SW Main Streets. This is NOT the Multnomah County Courthouse.  |
| What time do I report for service?  | Between 7:15 am and 8:00 am.   |
| Where should I park?  | Do not park on the street. Use the enclosed parking information to locate a nearby garage or lot.  |
| Do you validate parking?  | Parking is reimbursed at a flat rate of \$18.00 per day. Complete a Parking Certification Form after check-in to be reimbursed.  |
| Do you reimburse for mileage or gas?                                      | Jurors receive a roundtrip mileage reimbursement that can be used for gas.   |
| Do you cover mass transit fees?   | If you do not pay to park, your round-trip mileage reimbursement can be used to cover the cost of mass transit fees.   |
| Are long-distance jurors reimbursed for lodging and meals?                | Yes. All long-distance jurors receive a Long-Distance Traveler Information Form, which includes reimbursement instructions.  |
| Where is the courthouse entrance?   | Use the gate located on SW Main Street between SW Second and SW Third Avenues, walk to the front of the building, and turn right.  |
| Do I need I.D. to enter the courthouse?                                   | Yes. Show your summons and picture I.D. at the security checkpoint AND at the Jury Assembly Room check-in window.  |
| Do I get paid to serve?   | Jurors are paid \$50.00 per day. Federal government employees are exempt from receiving the attendance fee and must complete a Waiver of Juror Fees and Allowances after check-in.   |
| How long will I be at the Courthouse?                                     | Plan on being available all day on selection day and for several days if selected as a juror.  |
| How long are trials?  | Most trials last approximately three to ten days. A trial-length notice is generally included with summonses for trials exceeding ten days.  |
| How do I know if my civil right to serve on a jury has been restored?     | If you were convicted of a felony under Oregon law or federal law and <ul style="list-style-type: none"> <li>• have been released from incarceration, or</li> <li>• the conviction was set aside,</li> </ul> please refer to Or. Rev. Stat. §§ 10.030 and 137.281. |
| Is there a dress code?  | There is no formal dress code. "Business casual" is recommended.   |
| Can I request ADA accommodations?   | Yes, call 503-326-8100 to arrange for accommodations.  |
| How do I reach a Jury staff member?                                       | E-mail: <a href="mailto:pjury@ord.uscourts.gov">pjury@ord.uscourts.gov</a> or Phone: 503-326-8100  |



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MELISSA AUBIN  
CLERK OF COURT

PAUL BRUCH  
CHIEF DEPUTY CLERK

**SUBJECT: Instructions for Prospective Jurors**

Dear Prospective Juror:

The United States District Court for the District of Oregon hereby summonses you as a potential juror in a criminal jury trial beginning July 10, 2023, at the Mark O. Hatfield United States Courthouse in Portland, Oregon.

To reduce the time and inconvenience to jurors, the Court has drafted a prescreening questionnaire that you must complete before in-court jury selection. You may choose to download the questionnaire from the Court's website (see Page 2 for instructions) and return it by e-mail or complete and return the enclosed paper copy.

It is important that you complete the questionnaire from your own personal knowledge. **Do not** do any research on the Internet or speak to anyone else, including family and friends, about the topics or individuals found in the questionnaire. You will be questioned in court under oath as to whether or not you complied with the instruction not to research or discuss these matters.

Please do all of the following and return the completed forms **no later than June 30, 2023**:

1. **If you have not already responded to the summons**, visit the Court's website, [ord.uscourts.gov](http://ord.uscourts.gov), hover over the "Jurors" tab, and click "log in to eJuror". You will need the nine-digit participant number highlighted in yellow at the top of the Summons (the summons was mailed separately). If you are unable to respond online, you may complete the lower portion of the Summons, detach it, and return it by mail using the provided postage-paid envelope.
2. **Complete the Juror Questionnaire** as described in the table below or by completing the paper copy and returning it in the enclosed, postage-paid envelope. The questionnaire must be returned electronically or postmarked no later than June 30, 2023.

**You must respond to the summons and complete the Juror Questionnaire even if you plan to request deferment or excuse.**

To download the questionnaire form and submit it by e-mail:

| STEP | ACTION  |
|------|---|
| 1    | Open an Internet browser.   |
| 2    | Type the following address in the Internet address bar:<br><br><b>www.ord.uscourts.gov/klein2023</b>  |
| 3    | Save the .pdf questionnaire form to your computer.  |
| 4    | Complete and electronically sign the questionnaire, <b>click the save button</b> , and close the questionnaire.   |
| 5    | Attach the completed questionnaire to an e-mail and send it to:<br>pjury@ord.uscourts.gov. Please include your full name and participant number (located on the front of your Summons) in the subject line of the e-mail. |

Thank you for your dutiful participation during this process. The Court could not fulfill the Constitution's guarantee of a fair and impartial trial by jury without it.

Sincerely,

*Nicole Muñoz*

Nicole T. Muñoz  
Jury Supervisor

Enclosures: Supplemental Questionnaire  
Business Reply Envelope

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

**CONFIDENTIAL JUROR QUESTIONNAIRE**

**DEAR PROSPECTIVE JUROR:**

You have been summoned by this Court for jury service in a federal criminal case titled *United States v. Tony Daniel Klein*. The Court instructs you not to discuss this case or your answers to this questionnaire with anyone, including your family or fellow jurors. It is important to the fairness of this process that you do not engage in any research, such as searching for stories on the internet or social media about this case or anything to do with it. You must not read or listen to any media accounts, whether in a newspaper, on the internet, on television, or on the radio. Do not discuss or post anything about this case on any electronic or social media, including Facebook, YouTube, Twitter, Reddit, Instagram, LinkedIn, Snapchat, TikTok, email, text message, any blog, website or chat forum, or any other media. You must not let anyone, including family, friends, news media, parties, or witnesses, speak with you about your views or any aspect of this case, including your answers to this questionnaire, unless and until the Court has permitted or instructed you to do so.

In this case, the Government has charged the defendant, Tony Daniel Klein, in a 25-count indictment. The indictment charges Mr. Klein with 21 counts of violating 18 U.S.C. § 242, alleging that he sexually assaulted 12 female inmates at the Coffee Creek Correctional Facility (CCCF) in Oregon while employed as a corrections nurse. The indictment also charges Mr. Klein with four counts of violating 18 U.S.C. § 1623, alleging that he falsely denied engaging in various sexual conduct with any incarcerated woman while employed by CCCF. The charges are only allegations; they are not evidence. The defendant has pleaded not guilty to all charges and is presumed innocent. It will be the responsibility of the government, through a jury trial, to prove these charges beyond a reasonable doubt.

As part of the jury selection process, you must complete this juror questionnaire. Your answers to the questions on this form will assist the Court and the attorneys in the jury selection process for this trial. This questionnaire is designed to obtain information about your background as it relates to your service as an unbiased, fair, and impartial juror in this case. Unless a question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question will be an issue in this case. As you read the questions, you are not to draw any

inferences about the issues that must be decided by the jury in this matter. The questions are not meant to invade your privacy but only to help select a fair and impartial jury for this trial.

If there is any reason why you might not be able to give all parties (the government and the defendant) a fair trial in this case, it is important that you say so now. Please answer each question as fully as you can. Your complete honesty is essential to the fairness of this process. Do not leave any question blank. If a question does not apply to you, write “N/A” (“not applicable”), rather than leaving the answer blank. If you do not understand a question, please state that in the space for the answer. If you feel that an answer would be too personal, please say so in the space provided. You will have the opportunity to discuss your answers privately. If you need more space for any response to a question, please use the extra sheet attached at the end of the questionnaire. If you use the extra sheet, please clearly indicate which numbered question (or questions) you are answering.

The purpose of this questionnaire is to determine whether, if you are selected as a juror in this case, you could fairly and impartially decide this matter based solely on the evidence that will be presented at trial and the instructions about the law that will be given to the jury by the Court. The Court and the lawyers understand that every person has beliefs and biases concerning many things. You should answer with your honest feelings, whatever they may be. Do not assume that any of your answers will qualify or disqualify you from serving on this jury.

Your answers to this questionnaire are confidential, and the Court is sensitive to your privacy. Your responses will be reviewed by the Judge and the lawyers in this case, and your privacy will be maintained. After a jury has been selected, the original questionnaire will be returned to the Clerk of the Court and kept under seal, and it will only be disclosed, if at all, with names and other identifying information removed.

Upon completion, please sign your name on the last page where indicated. You are expected to sign your questionnaire, and your answers will be given the same effect as a statement given to the Court under oath. Thank you for your cooperation and assistance in this important matter.

**Michael H. Simon**  
**United States District Judge**  
**District of Oregon**

### JUROR QUESTIONNAIRE

1. Full Name: \_\_\_\_\_ Participant No. 21 \_\_\_\_\_
2. Age: \_\_\_\_\_
3. Preferred Pronoun and Gender Identity: \_\_\_\_\_
4. City or Community you currently live in: \_\_\_\_\_
5. How long have you lived in your current city or community? \_\_\_\_\_
6. What is your racial and ethnic background? \_\_\_\_\_
7. It is difficult to predict the length of any trial, but this trial may take **three weeks** to complete. Trial generally is held Monday through Friday, from 9:00 a.m. to 5:00 p.m. with mid-morning, mid-afternoon, and lunchtime breaks.

Unless waived by a juror, a juror receives a daily attendance fee of \$50 per day for the first ten days of service, followed by \$60 per day thereafter. The Court may also reimburse mileage at \$0.655 per mile and \$18 per day for parking (upon certification of parking expenses). If a juror lives 75 or more miles from the courthouse, that juror may be considered a long-distance juror and information on lodging and food allowances has been included with that juror's summons.

Do you have any extraordinary personal, employment, or family obligations that would impose a serious burden or hardship on you such that it would be extremely difficult or impossible for you to serve as a juror in this case?

☐ Yes ☐ No

If "Yes," please explain:

8. Do you have any physical or mental health issues that would make it difficult for you to serve as a juror in this case? Also, do you have any difficulty seeing, reading English, understanding spoken English, or concentrating?

☐ Yes ☐ No

If "Yes," please explain:

9. Is there anything else going on in your life or work that would prevent you from giving this case your full attention for the duration of the trial?

☐ Yes ☐ No

If "Yes," please explain:

10. Will your employer continue to pay your salary if you are selected to serve on this jury?

☐ Yes ☐ No ☐ Not Sure ☐ I do not have an employer

11. Which of the following best describes your living situation?

☐ Own Home ☐ Own Apartment/Condo ☐ Own Mobile Home ☐ Rent Home

☐ Rent Apartment ☐ Rent Room ☐ Other: \_\_\_\_\_

12. What is your current relationship status? Are you:

☐ Single ☐ Never married ☐ Living with someone ☐ Divorced ☐ Widowed

☐ Married ☐ Previously divorced ☐ Currently separated ☐ Other: \_\_\_\_\_



13. For those persons who live in your household, please tell us their name, age, relationship to you, and occupation (if any):

| Name | Age | Relationship to You | Occupation |
|------|-----|---------------------|------------|
|      |     |                     |            |
|      |     |                     |            |
|      |     |                     |            |
|      |     |                     |            |
|      |     |                     |            |
|      |     |                     |            |

14. What is the highest level of education that you have completed?

☐ Middle School                      ☐ High School

☐ Technical or Vocational School

Major/Degree \_\_\_\_\_ School Attended \_\_\_\_\_

☐ 1-2 Years College

Major/Degree \_\_\_\_\_ School Attended \_\_\_\_\_

☐ 4 Years College

Major/Degree \_\_\_\_\_ School Attended \_\_\_\_\_

☐ Graduate School

Major/Degree \_\_\_\_\_ School Attended \_\_\_\_\_

15. Have you ever studied law, obtained a law degree, or received legal training?

☐ Yes    ☐ No

If "Yes," please explain.

16. Have you ever studied medicine or nursing, obtained a medical or nursing degree, or received medical training?

☐ Yes    ☐ No

If “Yes,” please explain.

17. Have you ever served in any branch of the armed forces of the United States (including the military reserves, National Guard, or ROTC)? ☐ Yes ☐ No

If yes, please list the branch, rank at discharge, place and date of service, and if you ever served in the military police or worked in the military court system:

18. What do you consider to be your primary employment status? (Check only one).

☐ Employed full-time      ☐ Retired      ☐ Homemaker  
☐ Employed part-time      ☐ Disability      ☐ Temporarily laid off  
☐ Self-employed      ☐ Unemployed      ☐ Other \_\_\_\_\_

19. If applicable, please list your current job and jobs you have held for the last 10 years, starting with the most recent. If you are retired, please list your occupations for the 10 years prior to your retirement.

| Dates of Employment | Job Title | Employer |
|---------------------|-----------|----------|
|                     |           |          |
|                     |           |          |
|                     |           |          |
|                     |           |          |
|                     |           |          |
|                     |           |          |

20. If you have a spouse or partner (or have had a spouse or partner within the past ten years), please list each of the jobs that your spouse or partner has had in the past ten years (including self-employment or homemaker), beginning with the current or most recent employment. If they are retired, please list their occupations for the 10 years prior to their retirement.

| Dates of Employment | Job Title | Employer |
|---------------------|-----------|----------|
|                     |           |          |
|                     |           |          |
|                     |           |          |
|                     |           |          |
|                     |           |          |
|                     |           |          |

21. Have you, a family member, or anyone close to you ever worked for, volunteered in, or ever otherwise been affiliated with any local, state, or federal law enforcement agency? These agencies may include local or state police, local or county jails, local or federal corrections, City Attorney's Office, District Attorney's Office, Attorney General's Office, County Sheriff's Office, United States Attorney's Office, Federal Bureau of Investigation, Bureau of Alcohol Tobacco Firearms and Explosives, Drug Enforcement Agency, U.S. Marshals Service, Homeland Security, Immigration and Customs Enforcement, IRS, etc.)?

If yes, please indicate below the person, the job, dates of employment, location, and the name of the law enforcement agency.

| Person | Job | Dates of Employment | Location | Agency Name |
|--------|-----|---------------------|----------|-------------|
|        |     |                     |          |             |
|        |     |                     |          |             |
|        |     |                     |          |             |
|        |     |                     |          |             |

22. Have you or anyone in your immediate family ever been accused of wrongdoing at work? If so, please explain the nature of the accusation and whether you feel they were treated fairly.

☐ Yes ☐ No

If "Yes," please explain:

23. Have you, a close family member, or friend ever been employed by anyone involved in criminal defense work, such as with private attorneys, public defenders, or private investigators?

If "Yes," please indicate the person, job, dates, location and employer name.

| Person | Job | Dates of Employment | Location | Employer |
|--------|-----|---------------------|----------|----------|
|        |     |                     |          |          |
|        |     |                     |          |          |
|        |     |                     |          |          |
|        |     |                     |          |          |

24. Have you, any family members, or anyone else close to you ever worked in the medical field?

☐ Yes ☐ No

If “Yes,” please explain:

25. How would you describe your feelings about the following members of the criminal justice system?

|                      |  |                                   |                                  |                                   |  |
|----------------------|--|-----------------------------------|----------------------------------|-----------------------------------|--|
| Federal prosecutors: | <input type="checkbox"/> Very positive | <input type="checkbox"/> Positive | <input type="checkbox"/> Neutral | <input type="checkbox"/> Negative | <input type="checkbox"/> Very negative |
| FBI:                 | <input type="checkbox"/> Very positive | <input type="checkbox"/> Positive | <input type="checkbox"/> Neutral | <input type="checkbox"/> Negative | <input type="checkbox"/> Very negative |
| Defense attorneys:   | <input type="checkbox"/> Very positive | <input type="checkbox"/> Positive | <input type="checkbox"/> Neutral | <input type="checkbox"/> Negative | <input type="checkbox"/> Very negative |
| Defendants:          | <input type="checkbox"/> Very positive | <input type="checkbox"/> Positive | <input type="checkbox"/> Neutral | <input type="checkbox"/> Negative | <input type="checkbox"/> Very negative |
| Expert Witnesses:    | <input type="checkbox"/> Very positive | <input type="checkbox"/> Positive | <input type="checkbox"/> Neutral | <input type="checkbox"/> Negative | <input type="checkbox"/> Very negative |
| Federal government:  | <input type="checkbox"/> Very positive | <input type="checkbox"/> Positive | <input type="checkbox"/> Neutral | <input type="checkbox"/> Negative | <input type="checkbox"/> Very negative |
| Judges/Court Staff:  | <input type="checkbox"/> Very positive | <input type="checkbox"/> Positive | <input type="checkbox"/> Neutral | <input type="checkbox"/> Negative | <input type="checkbox"/> Very negative |

Please explain the basis for any strong feelings (very positive or very negative) in more detail:

26. Have you or has any member of your immediate family ever been employed, or sought employment, with the Oregon Department of Corrections?

☐ Yes ☐ No

If “Yes,” please explain, and include whether it is yourself or someone in your family, where they were employed (or sought employment), the dates of that employment, and whether they are still working there. If the person is not still working there, please explain why.

27. Do you belong to or are otherwise affiliated with any community, civic, social, union, professional, fraternal, political, religious, or recreational organizations (examples might include PTA, Kiwanis, Rotary Club, American Legion, NRA, VFW, Masonic Orders, Knights of Columbus, Political Action Committees, etc.)?

☐ Yes ☐ No

If “Yes,” please list which ones:

Have you held any offices or positions of leadership in any of these organizations?

☐ Yes ☐ No

If “Yes,” please describe:

Do you contribute money or services to any of these organizations?

☐ Yes ☐ No

If “Yes,” which ones:

28. From which sources do you most often get your news (e.g., Fox News, NPR, New York Times, Yahoo News, The Oregonian, OPB, Facebook, Breitbart, podcasts, etc.)?

|  |                         |
|--|-------------------------|
| <input type="checkbox"/> Newspapers              | Which one(s)? _____     |
| <input type="checkbox"/> Local television news   | Which station(s)? _____ |
| <input type="checkbox"/> Cable News              | Which network(s)? _____ |
| <input type="checkbox"/> Social media/Internet   | Which site(s)? _____    |
| <input type="checkbox"/> Radio                   | Which station(s)? _____ |
| <input type="checkbox"/> Podcast                 | Which one(s)? _____     |
| <input type="checkbox"/> Friends/Word of Mouth   |                         |
| <input type="checkbox"/> I don’t follow the news |                         |

29. What three internet websites do you most frequently visit?

30. If you have a car, does it have any bumper stickers or magnets?

☐ Yes ☐ No

If "Yes," what do they say or show?

31. Please name a famous person whom you admire and explain why. (Please select an individual whom others likely would know.)

32. Have you ever followed media or press reports of a criminal case on television, radio, in print, and/or over the internet?

☐ Yes ☐ No

If "Yes," which case(s) did you follow and why?

33. Do you watch TV programs that show real-life or dramatized police, prison, or legal activities (for example, "Law and Order: SVU," "CSI," "FBI," "Orange is the New Black," "Love after Lockup," etc.)?

☐ Yes ☐ No

If "Yes," which shows do you watch? How often?

34. Have you ever served on a jury before?

☐ Yes ☐ No

If "Yes," did you serve on: ☐ a criminal case? ☐ a civil case? ☐ a grand jury?

Have you ever served as the Presiding Juror (Foreperson) of a jury?

☐ Yes ☐ No

Did your jury (or juries) reach a verdict?

☐ Yes ☐ No

If you recall, what issues, claims, or charges were presented in any trial or trials in which you previously served as a juror?

35. Have you ever been a witness in a civil or criminal case in state or federal court?

☐ Yes ☐ No

If "Yes," please briefly describe the case, your role, and the outcome.

36. Have you or any member of your family ever been a party (either a plaintiff or a defendant) in a civil case in either state court or federal court?

☐ Yes ☐ No

If "Yes," please describe the case, your role, and the outcome of the case.

37. Have you, a close family member, or a close friend ever been a party to any legal action or proceeding involving the United States, its officers, agents, or employees?

☐ Yes ☐ No

If "Yes," please explain:

38. To the best of your knowledge, have you, any family members, or anyone else close to you ever been the victim of a crime? (Examples may include assault, identity theft, carjacking, fraud, etc.).

☐ Yes ☐ No

If “Yes,” please explain (including the person’s relationship to you, approximately when and where the crime occurred, the nature of the crime, and the outcome of any prosecution).

Do you believe the victim was treated fairly?

☐ Yes ☐ No

If “No,” please explain:

Whether or not a perpetrator was caught, were you satisfied with the conduct of the police investigation?

☐ Yes ☐ No

If “No,” please explain:

Please describe what, if anything, about your experience with the legal process in this context you would like to see changed or wish had been done differently.

Would this experience interfere with or in any way influence your ability to reach an impartial verdict based only on the evidence in this case and the law as instructed by the Judge?

☐ Yes ☐ No

If “Yes,” please explain:



39. Have you, any family members, or anyone close to you ever been the subject of a criminal investigation, charged with a crime, or convicted of a crime? (Do not include traffic tickets or citations).

☐ Yes ☐ No

If “Yes,” please describe the nature of the investigation/charges, whether charges were brought, whether there was a conviction, and whether there was any sentence imposed.

Do you believe the subject of the investigation was treated fairly?

☐ Yes ☐ No

If “No,” please explain:

Were you satisfied with the conduct of police or other law enforcement involved in the matter, including the prosecutors?

☐ Yes ☐ No

If “No,” please explain:

Please describe what, if anything, about your experience with the legal process in this context you would like to see changed or wish had been done differently.

Would this experience interfere with or in any way influence your ability to reach an impartial verdict based only on the evidence in this case and the law as instructed by the Judge?

☐ Yes ☐ No

If “Yes,” please explain:

40. Is any department or agency of the United States government currently asserting a claim against you or any family member or close friend?

☐ Yes ☐ No

If “Yes,” please explain:

41. If seated as a juror in this trial, you will hear words and phrases, including slang terms, related to body parts, such as “penis,” “vagina,” and “breast,” and terms related to sexual acts, such as “blow job” or “fingering.” Is there anything about hearing such terms that would make it difficult for you to pay attention to the evidence in this case?

☐ Yes ☐ No

If “Yes,” please explain:

42. The alleged victims and some of the witnesses in this case have been convicted of crimes and have served time in prison. Others may have pending criminal charges. What are your opinions, generally, about people with criminal convictions, who have been incarcerated, or have pending criminal charges? What, if anything, do you believe is important to know when considering their testimony?

43. What are your opinions about people with drug or alcohol addictions? What, if anything, do you believe is important to know when considering the testimony of these individuals?

44. Do you have any experience with mental health conditions, such as bipolar disorder or borderline personality disorder, either yourself, someone in your family, or someone who is close to you?

☐ Yes ☐ No

If “Yes,” please explain:

What are your opinions about people with mental health conditions?

45. Do you believe that people who work in law enforcement or in a prison are more likely, less likely, or equally likely to tell the truth, compared to witnesses who do not work in law enforcement?

☐ More Likely ☐ Less Likely ☐ Equally Likely

Please explain:

46. Do you believe that people who work in the medical field (for example, doctor, nurse, therapist, dentist, etc.) are more likely, less likely, or equally likely to tell the truth, compared to witnesses who do not work in the medical field?

☐ More Likely ☐ Less Likely ☐ Equally Likely

Please explain:

47. Have you or has any member of your family ever been sexually assaulted or sexually harassed, whether reported or not?

☐ Yes ☐ No

If “Yes,” please identify whether it was yourself or someone in your family.

48. Have you or has any member of your family ever reported someone else for committing sexual assault or sexual harassment?

☐ Yes ☐ No

If “Yes,” please explain your or your family member’s experience reporting. Is there anything you would like to have changed about that experience or wish had been done differently?

49. Have you or has any member of your family ever been accused of sexual assault or sexual harassment?

☐ Yes ☐ No

If “Yes,” please explain. Is there anything you would like to have changed about that experience or wish had been done differently?

50. Have you or any member of your family ever been *falsely* accused of sexual assault or sexual harassment?

☐ Yes ☐ No

If “Yes,” please explain. Is there anything you would like to have changed about that experience or wish had been done differently?

51. Have you or has any member of your family ever participated as a party in a civil lawsuit seeking damages for sexual harassment, sexual abuse, or a sexual assault?

☐ Yes ☐ No

If “Yes,” please explain.

52. During the past few years, the “Me Too” movement has sparked a national debate on sexual assault and harassment. Some people feel that the “Me Too” movement has been a good thing because it has raised awareness about a problem in society and has increased accountability. Other people feel that many people accused of sexual harassment or sexual assault these days are being targeted for the purpose of revenge or financial gain. What are your thoughts about this issue?

53. Some people believe that individuals who file lawsuits relating to sexual assault or harassment are looking for a handout, while others believe that those who are assaulted or harassed are entitled to financial compensation for abuse. What are your thoughts on this issue?

54. Have you read or heard anything about this case or accusations about sexual misconduct in Oregon prisons from any sources (for example, television, newspaper, radio, books, internet, Twitter, personal knowledge, or conversations)?

☐ Yes ☐ No

If “Yes” to any of the above, please describe what you have seen, heard, or read about this case. Please also share any opinions you have heard anyone express about this case:

55. Do you know or have you seen or heard anything about the Defendant, Tony Daniel Klein?

☐ Yes ☐ No

If “Yes,” please explain:

56. Do you know any of the attorneys associated with this case?”

|                              |                             |                 |
|------------------------------|-----------------------------|-----------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Cameron A. Bell |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Gavin W. Bruce  |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Kristen Clarke  |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Hannah Horsley  |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Matthew McHenry |

☐ Yes ☐ No Amanda Thibeault

☐ Yes ☐ No Natalie K. Wight

If “Yes,” please explain:

57. Do you know anyone who works for, or has worked at, any of the following businesses, law firms, or other entities? (Check all that apply. Do not do any research or investigation on the internet or elsewhere.)

☐ Yes ☐ No United States Attorney’s Office

☐ Yes ☐ No United States Department of Justice

☐ Yes ☐ No Federal Bureau of Investigation (FBI)

☐ Yes ☐ No Levine & McHenry LLC

☐ Yes ☐ No Alvarez Thibeault LLC

If “Yes,” please explain how you know that person:

58. Do you know any of the following people who may testify as a witness in this case? (Check all that apply.) (Do not do any research or investigation on the internet or elsewhere.)

☐ Yes ☐ No Ackerman, Caryn

☐ Yes ☐ No Alleyne, Constantine

☐ Yes ☐ No Armitage, Wendy

☐ Yes ☐ No Becker, Erik

☐ Yes ☐ No Bowditch, Elizabeth

☐ Yes ☐ No Bowman, Dave

☐ Yes ☐ No Brash, Mike

☐ Yes ☐ No Bruns, Alana

☐ Yes ☐ No Card, Jordan

☐ Yes ☐ No Childress, Ed

|                              |                             |                      |
|------------------------------|-----------------------------|----------------------|
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | De La O, Karin       |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Drew, Chad           |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Dumond, Robert W.    |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Greiner Flindt, Erin |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Hannon, Teresa       |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Haynes, Scott        |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Hiser, Eric          |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Koznek, Dane         |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Lamb, Roslyn         |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Martin, Katherine    |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | McKay, Sydney        |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Merten, Marie        |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Noack, Lindsay       |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Orr, Jacqueline      |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Pries, Christina     |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Riggs, Lewis         |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Russo, Kristina      |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Sabin, Liz           |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Sage, Ericka         |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Schain, Lori         |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Shockey, Thomas      |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Springer, Linda      |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Van Pelt, Raymond    |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Ward, Marylou        |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Wilkins, Leah        |
| <input type="checkbox"/> Yes | <input type="checkbox"/> No | Wolery, Cally        |



If you said “Yes” to anyone listed above, please explain how you know that person.

59. U.S. District Judge Michael H. Simon is expected to preside over this trial. His Courtroom Deputy is Ms. Mary Austad. His Court Reporter is Mr. Dennis Apodaca. Do you know Judge Simon or any members of his staff?

☐ Yes ☐ No

If “Yes,” please explain:

60. As a juror, it is important to the fairness of this process that you do not obtain any information about this case outside of the courtroom. The Court will instruct the jury that the jury may not read, watch, or listen to any news or media accounts or commentary about the case or anything to do with it; may not do any factual or legal research about anything related to the case, such as consulting dictionaries, searching the internet, or using other reference materials; and may not investigate or in any other way try to learn on their own about the case or the people involved, including the parties, the witnesses, or the lawyers. If a juror happens to read, see, hear, or learn anything about this case, the juror must turn away and report that contact to the Court as soon as possible. If you are selected to be a juror in this case, will you be able to follow this instruction?

☐ Yes ☐ No

If “No,” please explain.

61. If you are selected to serve on the jury for this case, will you be able to render a verdict (a) solely on the evidence presented at trial, (b) in accordance with the Court’s instructions on the law, (c) disregarding any other ideas, notions, or beliefs about the law that you may have encountered, and (d) not based on sympathy or any other impermissible bias?

☐ Yes ☐ No

If “No,” please explain.

62. Is there anything about the subject matter of this case, the parties, or anything mentioned in this questionnaire, or any matter not covered in this questionnaire, that creates a question in your mind as to whether you can be a fair, objective, and impartial juror in this case?

☐ Yes ☐ No

If “Yes,” please explain.

63. Do you have any religious, philosophical, or other beliefs that would make it difficult for you to be a juror in this case, or that would prevent you from sitting in judgment of another individual?

☐ Yes ☐ No

If “Yes,” please describe:

64. If there is anything not covered by this questionnaire that you think the judge or attorneys might want to know when considering you as a juror in this case, please explain below.

65. Is there any matter that you would like to discuss privately with the Judge and the parties?

☐ Yes ☐ No

If “Yes,” please identify the topic:

66. Did you have any difficulty reading or understanding this questionnaire?

☐ Yes ☐ No

If “Yes,” please explain.

67. Did anyone assist you in completing this questionnaire?

☐ Yes ☐ No

If “Yes,” please explain.

**JUROR OATH AND SIGNATURE**

I hereby state under penalty of perjury that all answers given by me in this Juror Questionnaire are true, correct, and complete to the best of my knowledge.

Because I am a potential juror in this case, I agree not to do any research, investigation, or reading on either the internet or anywhere else that may relate to any of the issues or names mentioned in this questionnaire. I also agree not to discuss anything about this case, share any information about this case, or even listen to anyone about this case unless I am expressly instructed or permitted to do so by the Judge.

I understand that if I am called to the federal courthouse for jury selection in this case, I will be questioned under oath about my compliance with these instructions.

I also understand that I am expected to advise the Judge right away if I become aware of any violation of any of these instructions, whether deliberate or accidental.

DATE: \_\_\_\_\_, 2023

\_\_\_\_\_  
Juror's Signature

\_\_\_\_\_  
Juror's Printed Name

**EXPLANATION SHEET**

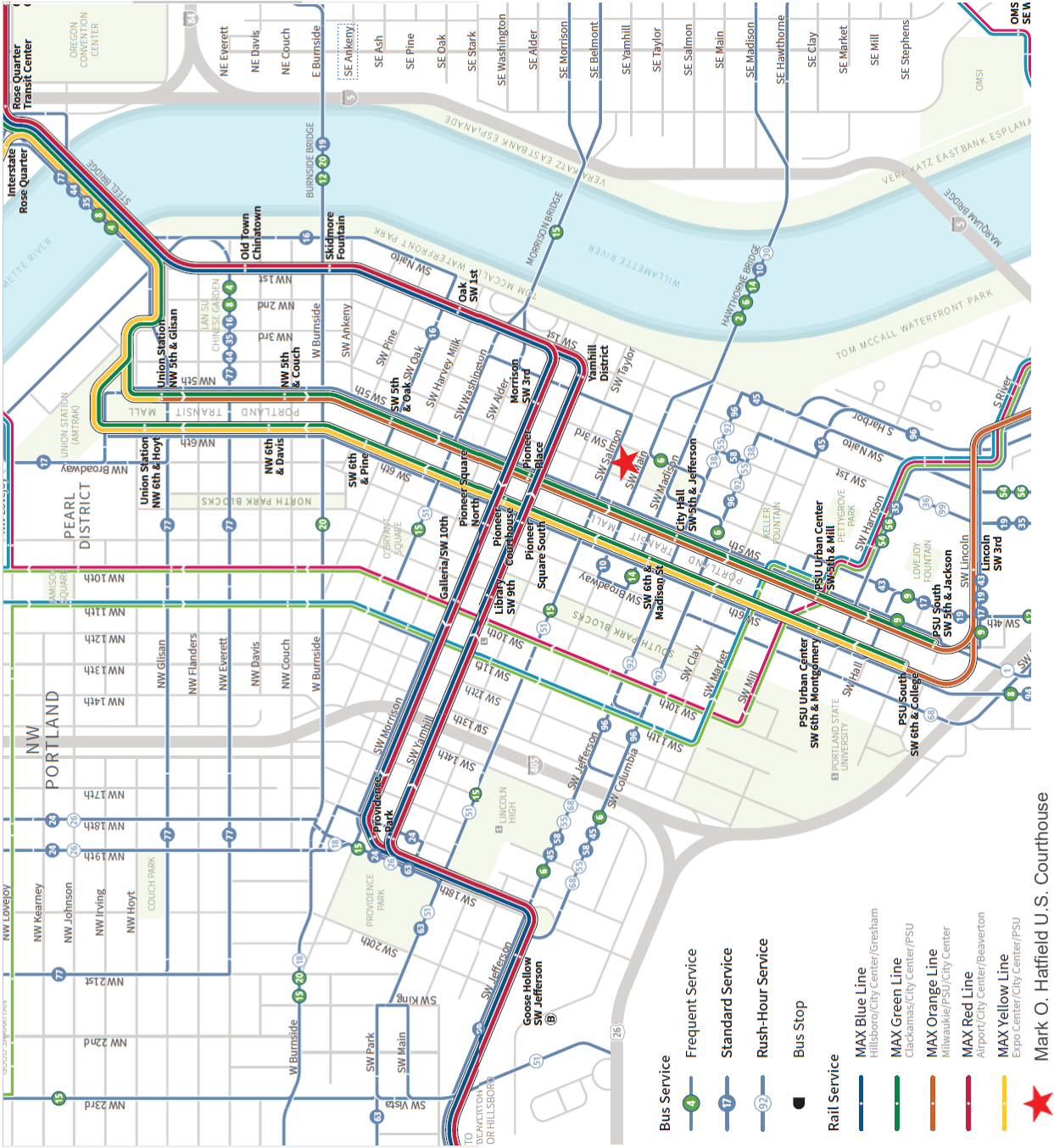
If you were unable to answer sufficiently any question in the spaces provided, please indicate the question number(s) and use this area to provide that additional information. Thank you very much for your cooperation.

Question No. \_\_\_\_\_

PORTLAND TRANSIT AND PARKING INFORMATION

Transit

The Mark O. Hatfield U.S. Courthouse is located at 1000 SW 3<sup>rd</sup> Avenue, Portland, OR 97204. Use the map below or visit the online TriMet Trip Planner (<https://trimet.org/home/>) to select a public transit route or use the information on the next page to locate parking near the Courthouse.



## Parking

Please do not park on the street as you will not have time to move your car or feed a meter during jury service.

There are many public parking garages and lots near the Courthouse. To locate a public garage or lot, you may do an online search for "Parking Near 1000 SW 3<sup>rd</sup> Avenue, Portland, OR 97204", or use one of the parking sites or apps listed below.

| PARKING VENDOR OR APP | WEBSITE   | PHONE NUMBER |
|-----------------------|---|--------------|
| SmartPark             | <a href="https://www.portland.gov/transportation/parking/smartpark">https://www.portland.gov/transportation/parking/smartpark</a> | 503-260-9184 |
| City Center Parking   | <a href="https://www.citycenterparking.com/">https://www.citycenterparking.com/</a>   | 503-221-1666 |
| World Trade Center    | <a href="https://wtcpdx.com/parking/">https://wtcpdx.com/parking/</a>   | 503-464-7207 |
| Park Chirp            | <a href="https://parkchirp.com/">https://parkchirp.com/</a>   |              |
| Park Me               | <a href="https://www.parkme.com/">https://www.parkme.com/</a>   |              |
| Parking Kitty (App)   | <a href="https://parkingkitty.com/">https://parkingkitty.com/</a>   |              |

Additional parking information, including disability placard parking maps and motorcycle parking maps, can be found at <https://www.portland.gov/transportation/parking/parking-guide>.

If you park in downtown Portland, you will be reimbursed for your parking at a flat rate. Reimbursement information is located in the enclosed Federal Juror Information Letter.